Message

From: Lindstrom, Andrew [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=04BF7CF26AA44CE29763FBC1C1B2338E-LINDSTROM, ANDREW]
Sent: 5/30/2017 12:50:13 PM
To: Detlef Knappe [knappe@ncsu.edu]; Strynar, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5a9910d5b38e471497bd875fd329a20a-Strynar, Mark]
Subject: RE: Can you take a look?
Attachments: dupont-WV final order 09.pdf; DuPont Final Version West Virginia Consent Order for GenX.pdf

Detlef,

This is a very interesting document.

I'll see if I can find out where the process wastewater is going - I'll see if Laurence (EPA, OCSPP) in DC can help.

So why doesn't this add up? Two reasons come to mind. First off, I'm not sure they even know what they're emitting or whether there is carry over or bleed from one process to another. I don't know, but I get the impression that it may be pretty complex and high volume and it they capture or control most of it, they're happy.

Secondly, there is no mechanism for checking compliance in the system. DEQ can't do much beyond review the paperwork. EPA (Region 4, OCSPP, ORD, OW) does not have a surveillance or monitoring capability. Sadly, we're sort of the only real mechanism that could possibly figure out what is going on with their discharges.

And they know this.

I think they pledged to capture 99% of their emissions when they we granted permission to start using GenX in the premanufacture notice process. Even one percent of a very large number can end up being a lot of ng/L in the river.

So where is this effluent going if it's being treated off site? We need to find out.

Thank you,

Andy

-----Original Message-----
From: Detlef Knappe [mailto:knappe@ncsu.edu]
Sent: Tuesday, May 30, 2017 8:21 AM
To: Lindstrom, Andrew <Lindstrom.Andrew@epa.gov>; Strynar, Mark <Strynar.Mark@epa.gov>
Subject: Can you take a look?

Andy and Mark,

Can you take a look at page 33 of the attached? Permit renewal application...

It is stated that wastewater from processing aid is not discharged to their wastewater system but is shipped off-site for disposal. Do you know where this wastewater is going?

It is stated that none of the processing aid is used on-site. I assume that GenX is at least on of the processing aids. This begs the question why the ether levels in the discharge are so high if (1) processing aid WW is not discharged and (2) processing aid is not used onsite.
Something doesn't seem to be adding up

Detlef

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